

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

FROST SOLUTIONS, LLC,

Plaintiff,

v.

PATRICK BAGLIEN, CHRISTOPHER LAREAU,  
and VUE ROBOTICS, LLC,

Defendants.

Civ. Action No. 1:22-cv-00401-SE

**DECLARATION OF CHRISTOPHER LAREAU IN SUPPORT OF  
HIS MOTION FOR PARTIAL SUMMARY JUDGMENT ON ONE ASPECT  
OF COUNT III (BREACH OF SEPARATION AGREEMENT)**

I, Christopher Lareau, do hereby declare and state the following:

1. I am a named defendant in the above-captioned action.
2. I submit this declaration in support of my *Motion for Partial Summary Judgment on One Aspect of Count III (Breach of Separation Agreement)* and memorandum of law in support thereof filed contemporaneously therewith.
3. If called as a witness, I could and would testify competently to the information set forth in this declaration.
4. On April 8, 2020, I accepted a written offer of employment with Frost Control Systems, Inc. d/b/a Frost Technologies (“Frost Control”) as a Regional Vice President. A true and accurate copy of my offer of employment containing the terms of my employment with Frost Control bearing production number FROST\_0027849 is attached hereto as Exhibit 1.
5. In or around May 2021, my position changed to Vice President of Sales.

6. This position change did not result in a compensation increase or a change in commission structure or benefits.

7. Throughout my tenure at Frost Control, the company struggled to remain viable.

8. On or about September 23, 2021, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] A true and correct copy of the September 23, 2021 email [REDACTED]  
[REDACTED] bearing production numbers FROST\_0037542 –  
FROST\_0037546 is attached hereto as Exhibit 2.

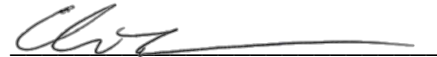
9. On September 27, 2021, I notified Frost Control's Board of Directors that I was resigning from Frost Control effective October 11, 2021. A true and correct copy of my notice of registration bearing production numbers FROST\_0028342 – FROST\_0028343 is attached hereto as Exhibit 3.

10. On September 30, 2021, I executed the version of the separation agreement attached hereto as Exhibit 4, which is a true and accurate copy of the fully executed separation agreement that was attached as Exhibit 3 to the complaint filed in this action.

11. I never consented to assignment of the Separation Agreement from Frost Control to Plaintiff Frost Solutions, LLC or any other party.

I declare under penalty of perjury as provided by law that the statements contained in this declaration are true and correct to the best of my knowledge and belief.

EXECUTED this 12th, day of March, 2024.

A handwritten signature in black ink, appearing to read 'Chris', is written over a horizontal line.

Christopher Lareau